

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -

UNITED STATES OF AMERICA

- v. -

JOSEPH SANDERS,

Defendant.

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X

Indictment

22 Cr.

22 CRIM 697

COUNT ONE

(Hobbs Act Robbery)

The Grand Jury charges:

1. On or about November 2, 2022, in the Southern District of New York and elsewhere, JOSEPH SANDERS, the defendant, knowingly did commit robbery and attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, SANDERS robbed an employee of a tax preparation business at gunpoint in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT TWO

(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

2. On or about November 2, 2022, in the Southern District of New York, JOSEPH SANDERS, the defendant, during and in relation

to a crime of violence for which he may be prosecuted in a court of the United States, namely, the completed robbery charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished, during the robbery charged in Count One of this Indictment.

(Title 18, United States Code, Sections 924(c)(1)(A)(i),
(ii), and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, JOSEPH SANDERS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981 (a) (1) (C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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JOSEPH SANDERS

Defendant.

INDICTMENT

22 Cr.

(18 U.S.C. §§ 924(c)(1)(A)(i) and (ii),
1951, and 2.)

DAMIAN WILLIAMS

United States Attorney



Foreperson

12/16/22 FROM HONORABLE CLERK ASST TO J. FORME
C-2021